

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

---

SANDRA JEANNE RANCOURT,  
Plaintiff,

vs.

CASE NO. 1:18-cv-00042-JTN-ESC

Judge Janet T. Neff  
Magistrate Judge Ellen S. Carmody

EXPERIAN INFORMATION  
SOLUTIONS, INC.; TRANS  
UNION, LLC; EQUIFAX, INC.;  
and EQUIFAX INFORMATION  
SERVICES, LLC;  
Defendants.

---

**[PROPOSED] STIPULATED ORDER**

---

Plaintiff, Sandra Jeanne Rancourt (“Plaintiff”) and Defendant, Trans Union, LLC (“Trans Union”) (collectively, the “Parties”) hereby stipulate and agree, pursuant to this Court’s Order Denying Plaintiff’s Motion For Protective Order [Doc. No. 53] as moot and Denying Plaintiff’s Motion For Sanctions [Doc. No. 51] and converting said Motion to a Motion To Support Objections To Discovery Requests [Doc. No. 66], to the following:

1. Trans Union properly amended its First Set Of Requests For Admission to Plaintiff by propounding upon Plaintiff its Amended First Set Of Requests For Admission in accordance with this Court’s Case Management Order [Doc. No. 41].
2. Trans Union’s First Set Of Interrogatories To Plaintiff did not fail to comply with this Court’s Case Management Order.
3. Trans Union’s First Set Of Interrogatories to Plaintiff (the “Interrogatories”) will be deemed amended as follows and Plaintiff will supplement her Answers accordingly:

a. Interrogatory No. 2 is limited to not seeking Plaintiff's Social Security number and is further limited to seek every address Plaintiff has used to within the last three (3) years only.

b. Interrogatory No. 3 is limited to requesting Plaintiff's work history for the last three (3) years only.

c. Interrogatory No. 15 is limited to requesting whether any claims or legal proceedings have been made by or against Plaintiff in the last five (5) years only.

4. Plaintiff will supplement her Answers to Trans Union's Interrogatories as follows:

a. Plaintiff will supplement her Answer to Interrogatory No. 12 so that said Answer is responsive to subsections (b), (d) and (e).

b. Plaintiff will supplement her Answer to Interrogatory No. 13 to include information responsive to Trans Union's request for identification of all persons with knowledge of Trans Union's alleged violations of 15 U.S.C. Section 1681.

c. Plaintiff will supplement her Answer to Interrogatory No. 14 so that it completely answers the Interrogatory.

5. As Plaintiff confirmed on the record that she is only seeking statutory damages against Trans Union for its alleged failure to provide her with a "file," Plaintiff is not required to supplement her Answers to Interrogatory Nos. 4-7, 9 and 11. Trans Union may serve an additional Request For Admission, asking Plaintiff to admit that she is only seeking statutory damages.

6. Plaintiff's Answers to Interrogatory Nos. 1, 8, 10, 17, 19 and 20 are deemed sufficiently responsive and Plaintiff need not supplement them.

7. Interrogatory Nos. 16 and 18 are withdrawn. Plaintiff's Answer to Interrogatory No. 18 is stricken.

8. Plaintiff shall serve her Supplemental Answers to Trans Union's Interrogatories within 14 days from the issuance of this Order.

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon. Judge Ellen S. Carmody

Respectfully submitted,

Date: July 13, 2018

/s/ James L. Policchio

Sandra Davis Jansen, Esq. (IN #27803-53)

Scott E. Brady, Esq. (IN #30534-49)

James L. Policchio, Esq. (IN #34737-49)

Schuckit & Associates, P.C.

4545 Northwestern Drive

Zionsville, IN 46077

Telephone: 317-363-2400

Fax: 317-363-2257

E-Mail: [sjansen@schuckitlaw.com](mailto:sjansen@schuckitlaw.com)

E-Mail: [sbrady@schuckitlaw.com](mailto:sbrady@schuckitlaw.com)

E-Mail: [jpolicchio@schuckitlaw.com](mailto:jpolicchio@schuckitlaw.com)

*Counsel for Defendant Trans Union, LLC*

Date: July 13, 2018

/s/ Sandra Jeanne Rancourt (with consent)

9083 Dennings Road

Jonesville, Michigan 49250

520-609-3132

[renucove@aol.com](mailto:renucove@aol.com)